

## EXHIBIT 3



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June 26, 2015

**VIA ELECTRONIC MAIL**

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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**Re: In re Terrorist Attacks, MDL No. 03-1570**

Gentlemen:

Further to our discussions on June 23, 2015, and my earlier letter dated March 16, 2015, we write on behalf of defendants Muslim World League ("MWL") and the International Islamic Relief Organization ("IIRO") concerning certain documents produced by plaintiffs in December 2014. In response to your request, in this letter we (i) identify the documents as to which we seek additional information; (ii) summarize our key concerns regarding the authenticity of these documents; and (iii) list the additional information we seek from the plaintiffs regarding the source of these documents and the manner in which plaintiffs obtained and later produced them.

**Identification of Documents.** The 13 documents in question bear the following Bates numbers: BUR-PEC 086105; BUR-PEC 086107; BUR-PEC 086108; BUR-PEC 086109; BUR-PEC 086110; BUR-PEC 086111; BUR-PEC 086112; BUR-PEC 086113; BUR-PEC 086114; BUR-PEC 086115; BUR-PEC 086116; BUR-PEC 086119; and BUR-PEC 086124.



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***Concerns Regarding Authenticity.*** None of the 13 documents identified above is contained within our clients' files, and while examining the documents we identified a number of issues that very strongly suggest that they are not authentic. For example, the vast majority of the documents purport to originate from offices that were not in operation during the dates of the documents and/or refer to offices that never existed. Some are on letterhead that contains grammatical errors or erroneous information, and others appear to be on letterhead that was long outdated and that is internally inconsistent with their purported dates. Further, all 13 documents are dated using the Gregorian calendar, while the overwhelming majority of correspondence sent from MWL and IIRO offices are dated by reference to the Hijri calendar. Indeed, the small percentage of authentic documents with Gregorian dates typically refer also to a Hijri date. Although we have not endeavored to provide herein an exhaustive list of authenticity concerns with respect to these documents, and reserve the right to raise other issues not identified in this letter at the appropriate time, each of the issues we have identified above independently indicates that these documents are after-the-fact fraudulently created documents. While we have no reason to believe and do not mean to suggest that plaintiffs' counsel had any role in generating these documents, it is nonetheless critical that we have comprehensive information regarding the provenance of these documents.

***Additional Information Requested.*** In light of the concerns outlined above, MWL and IIRO request that plaintiffs provide the following information for each of the 13 documents:

- (i) identify the source(s) of each document;
- (ii) specify how and when each document was obtained by plaintiffs;
- (iii) confirm that all documents obtained from the source(s) identified in number (i) above have been produced in this litigation. If you cannot so confirm, please explain in detail the reason for withholding any such documents from production;
- (iv) identify by Bates number each document obtained by plaintiffs from the source(s) identified in number (i) above;
- (v) indicate whether any markings on these documents (e.g., numbering in the upper right-hand corner of certain pages) were made *after* they were obtained by plaintiffs and, if so, identify the source of such markings; and
- (vi) identify the person(s) who provided the translation of the copies of these documents submitted with plaintiffs' Averment of Facts filed on February 5, 2015 (Docket No. 2930).

# Lewis | Baach PLLC

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We request a prompt response from you on this matter. Should you wish to discuss the foregoing, please let us know and we will schedule a call. In the interim, all rights are reserved.

Sincerely,



Aisha Bembry